

**Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services**

STATEMENT OF BASIS

**Polyethylene C Plant
Dow Chemical Co - Louisiana Operations
Plaquemine, Iberville/West Baton Rouge Parish, Louisiana
Agency Interest Number: 1409
Activity Number: PER20060064
Proposed Permit Number: 2048-V1**

I. APPLICANT

Company:
Dow Chemical Co - Louisiana Operations
PO Box 150
Plaquemine, Louisiana 70765-0150

Facility:
Polyethylene C Plant
Dow Chemical Co - Louisiana Operations
21255 Hwy 1
Plaquemine, Iberville/West Baton Rouge Parish, Louisiana,
Approximate UTM coordinates are 668.6 kilometers East and 3355.3 kilometers
North, Zone 15

II. FACILITY AND CURRENT PERMIT STATUS

Dow Chemical Company - Louisiana Operations operates the Polyethylene C Plant in the Louisiana Division complex. Polyethylene C Plant operates under Title V Permit 2048-V0. issued on March 1, 2002.

Dow Chemical Co - Louisiana Operations is a designated Part 70 source. Several Part 70 Permits have been issued to the operating units within the Dow Chemical Plaquemine facilities. These include:

Permit #	Units or Sources	Date Issued
2007-V2	Glycol I Plant	12/13/2006
2008-V3	Polyethylene A Plant	04/17/2007
2024-V3	Light Hydrocarbons III Plant	09/13/2006
2025-V1	Vector SBC Plant	05/12/2003
2048-V0	Polyethylene C Plant	03/01/2002
2179-V4	Polyethylene B Plant	08/08/2005

2188-V0	Solvents/EDC I Plant	01/30/2004
2200-V1	Chlorinated Polyethylene Plant	12/01/2004
2227-V4	Cellulose Plant	12/28/2006
2267-V2	Power & Utilities Plant	08/28/2006
2285-V3	Vinyl II Plant THROX Boilers	01/25/2007
2573-V3	Chlorine Cell Service Plants	08/22/2003
2665-V6	Vinyl II Plant	04/02/2004
2037-V0	Chlorinated Methanes Plant (CMP)	03/10/2005
2203-V1	Glycol II Plant	06/20/2005
2255-V0	Light Hydrocarbons II Plant	01/10/2006
2235-V0	Railroad Tank Car Cleaning Facility	01/18/2006
2190-V0	Environmental Operations Plant	05/31/2006

III. PROPOSED PROJECT/PERMIT INFORMATION

Application

A permit application and Emission Inventory Questionnaire were submitted by Dow Chemical Co on August 31, 2006 requesting a Part 70 operating permit renewal. Additional information dated March 28, 2007 was also received.

Project

This permit renewal does not include any project, physical change, or change in the method of operation of any existing processes. The emission changes are due to updating emission calculations.

Proposed Permit

Part 70 Operating Permit 2048-V1 will be the renewal of Part 70 Operating Permit 2048-V0 for the Polyethylene C Plant within the Dow Chemical Co - Louisiana Division.

Permitted Air Emissions

Estimated emissions in tons per year are as follows:

Pollutant	Before	After	Change
PM ₁₀	29.77	29.6	-0.17
SO ₂	7.47	7.5	+0.03
NO _x	147.19	84.6	-62.59
CO	34.07	34.1	+0.03
VOC	512.98	512.6	-0.38

LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

Pollutant	Before	After	Change
Biphenyl	0.03	0.1	+0.07
Carbon disulfide	0.06	0.1	+0.04
HCl	0.09	0.1	+0.01
Cl ₂	0.14	0.1	-0.04
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Total	0.32	0.4	+0.08

IV REGULATORY ANALYSIS

The applicability of the appropriate regulations is straightforward and provided in the Specific Requirements section of the proposed permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are also provided in the Specific Requirements section of the proposed permit.

Applicability and Exemptions of Selected Subject Items

Applicability and exemptions of selected subject items are listed as Table 1 and 2 at the proposed Part 70 Operating Permit.

Prevention of Significant Deterioration/Nonattainment Review

There is no project associated with this permit renewal. Prevention of Significant Deterioration (PSD) and Nonattainment New Source Review (NNSR) are not required.

Streamlined Equipment Leak Monitoring Program

It is required that the Polyethylene C Plant comply with a streamlined equipment leak monitoring program. Compliance with the streamlined program shall serve to comply with each of the fugitive emission monitoring programs being streamlined.

For the Polyethylene C Plant, fugitive emissions are subject to the requirements of LAC 33:III.2122 and NSPS Subpart DDD. Among these regulations, LAC 33:III.2122 is the overall most stringent program. Therefore, fugitive emissions shall be monitored as required by this program (LAC 33:III.2122).

Unit or Plant Site	Program Being Streamlined	Stream Applicability	Overall Most Stringent Program
Polyethylene C Plant	LAC 33:III.2122	10% VOC	LAC 33:III.2122
	NSPS Subpart DDD	10% VOC	

MACT Requirements

The facility is subject to Louisiana MACT requirements. Detailed requirements are listed in the Specific requirements Section of the draft permit.

Air Quality Analysis

Since there is no project associated with this permit renewal, air quality analysis is not required.

General Condition XVII Activities

Work Activity	Emission Rates – tons per year				
	PM ₁₀	SO ₂	NO _x	CO	VOC
Opening Losses					0.7
BACV-5					Neg.
BACV-6					Neg.

Insignificant Activities

ID No.:	Description	Citation
IA-1	Diesel Fuel Tank	LAC 33:III.501.b.5.A.3
IA-2	Vacuum Vent Analyzers on Train 1, Train 2 and Train 3	LAC 33:III.501.b.5.A.9
IA-3	Flare Analyzer	LAC 33:III.501.b.5.A.9

V. PERMIT SHIELD

No permit shield is requested.

VI. PERIODIC MONITORING

See Specific Requirements Section at the proposed permit.

VII. GLOSSARY

Carbon Monoxide (CO) – A colorless, odorless gas, which is an oxide of carbon.

Maximum Achievable Control Technology (MACT) – The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental

impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

Hydrogen Sulfide (H_2S) – A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the reaction of acids on metallic sulfides, and is an important chemical reagent.

New Source Review (NSR) – A preconstruction review and permitting program applicable to new or modified major stationary sources of air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C (“Prevention of Significant Deterioration of Air Quality”) and D (“Nonattainment New Source Review”).

Nitrogen Oxides (NO_x) – Compounds whose molecules consist of nitrogen and oxygen.

Organic Compound – Any compound of carbon and another element. Examples: Methane (CH_4), Ethane (C_2H_6), Carbon Disulfide (CS_2)

Part 70 Operating Permit – Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit: ≥ 10 tons per year of any toxic air pollutant; ≥ 25 tons of total toxic air pollutants; and ≥ 100 tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

PM_{10} – Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) – The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

Sulfur Dioxide (SO_2) – An oxide of sulfur.

Sulfuric Acid (H_2SO_4) – A highly corrosive, dense oily liquid. It is a regulated toxic air pollutant under LAC 33:III.Chapter 51.

Title V Permit – See Part 70 Operating Permit.

Volatile Organic Compound (VOC) – Any organic compound, which participates in atmospheric photochemical reactions; that is, any organic compound other than